

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

ABOU FADOUL SOUMAHORO,
a/k/a ABDOUL FADOUL
SOUMAHORO

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 911 and
1546(b)(1)

COUNT ONE

Use of False Statement in Immigration Matter

The Grand Jury Charges:

In or about May 2024, in the District of North Dakota,

ABOU FADOUL SOUMAHORO,
a/k/a ABDOUL FADOUL SOUMAHORO,

for the purpose of satisfying a requirement of the employment verification system set forth in subsection 1324a(b) of Title 8 of the United States Code, used a false attestation on the U.S. Citizenship and Immigration Services Employment Eligibility Verification Form I-9, knowing that the said attestation was false, in that he attested he was a lawful permanent resident of the United States knowing he was not in fact a lawful permanent resident of the United States, and in that he used identification documents not lawfully issued to him, to-wit, a passport card and social security card issued to another individual;

In violation of Title 18, United States Code, Section 1546(b)(1).

COUNT TWO

False Claim of United States Citizenship

The Grand Jury Further Charges:

In or about May 2024 through the date of this indictment, in the District of North Dakota,

ABOU FADOUL SOUMAHORO,
a/k/a ABDOUL FADOUL SOUMAHORO,

the defendant, a citizen of Mali and therefore an alien in the United States, falsely and willfully represented himself to be a citizen of the United States;

In violation of Title 18, United States Code, Section 911.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Jennifer Klemetsrud Puhl
JENNIFER KLEMETSRUD PUHL
Acting United States Attorney

GLD/tmg